

# **EXHIBIT I**

KEANE & BEANE, P.C.

ATTORNEYS AT LAW  
445 HAMILTON AVENUE  
WHITE PLAINS, NEW YORK 10601  
(914) 946-4777  
FAX (914) 946-6868  
www.kblaw.com

200 WESTAGE BUSINESS CENTER  
FISHKILL, NEW YORK 12524  
(845) 896-0120

STEPHANIE L. BURNS  
MEMBER  
SBURNS@KBLAW.COM  
ALSO ADMITTED IN NJ

July 15, 2008

VIA FEDERAL EXPRESS

Davida S. Perry, Esq.  
Schwartz & Perry, LLP  
295 Madison Avenue  
New York, NY 10017

Re: DeNardi v. DRA Imaging, P.C., et al.,  
07 Civ. 5794 (MGC)

Dear Davida:

I write in response to the document requests contained in your letter to Lance Klein, Esq. that is dated June 18, 2008. In your letter you requested the following:

1. All written warnings or write-ups prepared by Ginny Barkanyi concerning the performance of employees at DRA to which she testified at her deposition, including but not limited to Katina Collins, Carolyn Huyler.

**Response:** Defendants DRA Imaging, P.C. and Imaging Support Services, LLC (collectively, "Defendants") object to this request as vague, ambiguous and seeking documents that are not reasonably calculated to lead to the discovery of admissible evidence. Without waiving or limiting these objections, copies of the documents located to date that are responsive concerning Katina Collins are produced in Exhibit A to this letter and documents located to date that are responsive concerning Carolyn Huyler are produced in Exhibit B to this letter.

2. Copies of all written job descriptions for the positions of Assistant Manager and Manger that were held by Ms. Barkanyi during the course of her employment with DRA.

**Response:** Defendants object to this request as seeking documents that are not reasonably calculated to lead to the discovery of admissible evidence. Without

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waiving or limiting this objection, copies of the documents located to date that are responsive to this request are produced in Exhibit C to this letter.

3. Copies of all written job descriptions for the positions of Assistant Manager and Manger in the Billing Department that were held by anyone preceding Ms. Barkanyi, including but not limited to Gail Platt for the period September 1999 - May 8, 2006.

**Response:** Defendants object to this request as seeking documents that are not reasonably calculated to lead to the discovery of admissible evidence. Without waiving or limiting this objection, copies of the documents located to date that are responsive to this request have been produced in response to the preceding request and in Exhibit C to this letter.

4. All organizational charts of the Billing Department that were prepared by Ms. Barkanyi (other than those already produced), Gail Platt and Nancy Rasmussen during the period September 1999-May 8, 2006.

**Response:** Excluding the organizational charts previously produced by Defendants in response to Plaintiff's First Notice to Produce, a copy of the document located to date that is responsive to this request has been produced in Exhibit D to this letter.

If you have any questions concerning the documents produced in the Exhibits hereto, please do not hesitate to contact me.

Very truly yours,



Stephanie L. Burns

SLB/pe  
Enclosures